



P.O. Box 8684
Portland, OR 97207
(925) 330-0359
Megan@InformationDignityAlliance.org

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#: _____
DATE FILED: 5/16/2024

May 15, 2024

VIA ECF

Hon. Andrew L. Carter Jr.
U.S. District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: Request for an Extension of Time to File the Amended Complaint *Wright v. Mail Media Inc. et al.*, No. 1:23-cv-07124-ALC (S.D.N.Y.)

Dear Judge Carter:

Plaintiff Hillary Wright hereby respectfully requests this Court to extend Plaintiff's deadline to file an amended complaint from May 17, 2024, to June 3, 2024.

The parties originally proposed a briefing schedule for a motion to dismiss on January 31, 2024 (the "Original Briefing Schedule"). Dkt. 39. This Court memo endorsed the schedule on February 1, 2024. Dkt. 41. Plaintiff represented herself pro se at that time.

After the parties agreed to the Original Briefing Schedule, Plaintiff retained counsel. Plaintiff's counsel requested to alter the briefing schedule so that Plaintiff's counsel could draft an amended complaint. Dkt. 47. This Court granted that request. Dkt. 48.

Now Plaintiff's counsel respectfully requests a second extension of time to file the amended pleadings as set out below.

Current Schedule Granted in Dkt. 48	
Plaintiff files First Amended Complaint	May 17, 2024
Defendant files Answer or Other Response	June 17, 2024

Proposed Schedule	
Plaintiff files First Amended Complaint	June 3, 2024
Defendant files Answer or Other Response	July 9, 2024

This is Plaintiff's second extension request to file her amended complaint. Plaintiff's counsel has been diligently working to meet the previously agreed upon deadline. However, her husband has had some health issues that have taken some time to deal with. These issues have caused delay in producing her work in the previously anticipated timeframes.

On May 13, 2024, Plaintiff's counsel reached out to Defendants' counsel about altering the briefing schedule. Defendants' counsel promptly responded stating that Defendants consent to Plaintiff filing her amended complaint by June 3, 2024. Further, the Plaintiff consented to amend Defendants' deadline to answer or otherwise respond to the amended complaint until July 9, 2024.

For the reasons stated above, Ms. Wright hereby respectfully requests that the Court amend the briefing schedule to the Proposed Schedule listed above.

Respectfully submitted,

/s/ Megan Keenan

Megan Keenan

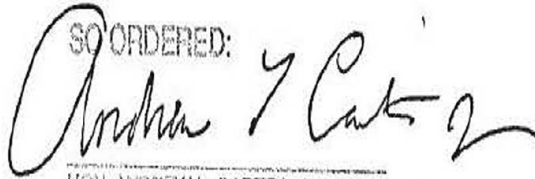
Attorney

INFORMATION DIGNITY ALLIANCE

(925) 330-0359

Megan@InformationDignityAlliance.org

Attorney for Plaintiff Hillary Wright

SO ORDERED:


HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

Dated: May 16, 2024